

EPA INSPECTION REVIEW
RockTenn Tacoma Mill, LLC
Tacoma, Washington 98421

SPCC RULE REFERENCE	PLAN	FIELD	INSPECTION DEFICIENCY DESCRIPTION (8/6/2015)
112.7 General SPCC Requirement	X	NA	Management approval at a level of authority to commit the necessary resources to fully implement the Plan.
112.7(a)(3)(i) Plan Diagram	X		Plan Addresses: For each fixed container, type of oil and storage capacity. For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities. <i>"The SPCC Plan lists a 15,000 gallon turpentine oil tank in section 2.2.1, Figure 4, page 14, but in Appendix H, Table 1, page 5, this container is not listed (nor was it found elsewhere in Appendix H). The inconsistency between these two parts of the plan needs to be corrected."</i>
112.7(b) Discharge Prediction	X	NA	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure. <i>"The spill prediction in section 2.3 of the SPCC Plan does not include transfer piping or transfer areas. The SPCC Plan spill prediction must include all components of the facility that have a potential for oil discharge. The remainder of the spill prediction for all other facility components, including oil-filled operating equipment, states that the predicted release is the entire contents of the container or equipment at an instantaneous rate. While this last observation is not a deficiency, the facility may wish to have their engineer consider the "most probable" discharge volume and rate for oil-filled operational and manufacturing equipment."</i>
112.8(c)(6) Integrity Testing	X		The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design. <i>"The facility must document corrective actions following periodic (e.g. monthly informal visual) bulk oil storage container inspections."</i>